

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In re: **George Brown** : Chapter 13  
:   
:   
Debtor : Bankruptcy No.: **18-15005**

**REQUEST FOR ADMISSIONS**

Pursuant to F.R.C.P.36, Objectors hereby request the following admissions of the Respondent:

1. Respondent alleges in the Proof of Claim **Principal & Interest due** in the amounts of **\$9,336.21**. Respondent admits that the aforesaid amount is inaccurate, in that it fails to give proof for all payments received.
2. Respondent alleges in the Proof of Claim **Prepetition fees due** in the amount of **\$2,210.24**. Respondent admits that the aforesaid amount is unreasonable and/or not actually incurred.
3. Respondent alleges in the Proof of Claim **Escrow deficiency for funds advanced** in the amount of **\$5,780.35**. Respondent admits that the aforesaid amount is unreasonable and/or not actually incurred.
4. Respondent alleges in the Proof of Claim **Projected escrow shortage** in the amount of **\$2,325.57**. Respondent admits that the aforesaid amount is unreasonable and/or not actually incurred.

Date: **March 28, 2019**

Respectfully submitted,

**By: /s/ Michael D. Sayles**  
Michael D. Sayles  
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